

**Headquarters**

Washington, DC 20546-0001



September 23, 2004

Reply to Attn of:

**General Law Practice Group**

**TO: Distribution**

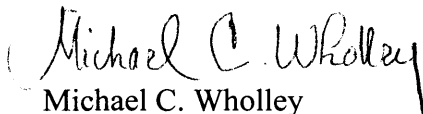
**FROM: Designated Agency Ethics Official**

**SUBJECT: Blanket Determination Regarding Attendance at a Dinner and Reception  
Honoring the Senior Minister of Singapore, September 23, 2004**

AEA Investors will host a dinner at The Frick Collection in honor of Mr. Lee Kuan Yew, Senior Minister of Singapore. Mr. Kuan Yew is one of Asia's leading statesmen, and he will speak on his experiences as a leader of Singapore, which became a joint financial and industrial powerhouse that belies the size of the country under his tenure. It has been determined to be in the best interest of the Government for those NASA employees who are invited to the dinner and reception to attend in their official capacities and as representatives of NASA.

Officials from European businesses, financial institutions from across the world, and members of the public will attend the dinner. Approximately 115 people are expected to attend the dinner. The estimated cost of the dinner, which includes food and beverage is \$125 per person. The event will give NASA employees an opportunity to exchange information regarding international financial, industrial, and economic matters. I find that this event meets the requirements of a "widely attended gathering" as defined in 5 CFR 2635.204(g). Consequently, I conclude that NASA's interest in its employees attending this event outweighs any concern that free attendance may, or may appear to, improperly influence NASA employees in the performance of their official duties.

Accordingly, NASA invitees and their spouses or guests may attend the dinner without charge.

  
Michael C. Wholley